



**LINCOLN CONSERVATION DISTRICT**

655 U.S. Highway 93 North  
Eureka, Montana 59917  
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November 29, 2001

Paul Peronard  
U.S. Environmental Protection Agency  
Region 8  
999 - 18<sup>th</sup> Street, Suite 300  
Denver, CO 80202-2466

Dear Mr. Peronard:

We are writing to you about an environmental/conservation concern about the rock rip rap placed on the banks of the Kootenai River on the old Raintree Nursery property and the work in progress in Rainy Creek, near Libby, Montana.

The conservation district administers the Natural Streambed and Land Preservation Act, which is a state law that regulates activities performed by private individuals in perennial streams. We have approved many rip rap projects. We usually recommend to applicants when placing rip rap that they place rock on the bottom third of the bank and leave the soil on the upper two-thirds to promote the establishment of vegetation. This, we feel is a conservation benefit for fish habitat and the natural aesthetic value. We recommend that soil be placed over the rock along the Kootenai River down to the 28,000 cfs level and that this area be planted with natural vegetation.

We recognize that we have no jurisdictional authority over a federal government agency, but we strongly encourage you to contact a fluvial geomorphologist consultant or you could contact Kirk Sullivan, hydrologist, Natural Resources Conservation Service, (406)-296-2233, to assist you in incorporating some bioengineering techniques in the Rainy Creek project. We do not feel that the present stabilization proposal in Rainy Creek will be adequate.

Sincerely,

John L. Beebe, Chairman  
Lincoln Conservation District  
Board of Supervisors